

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Alexis Templeton, Maureen Costello,)
Brittany Ferrell, Steven Hoffmann,)
Nile McClain, Kira Hudson Banks,)
)
Plaintiffs,)
v.)
)
Sam Dotson, Chief of Police,)
City of St. Louis,)
Jon Belmar, Chief of Police)
County of St. Louis,) No.
Capt. Ron Johnson, Missouri)
Highway Patrol, In their official)
capacities and as part of the Unified)
Command)
)
Defendants.)
)

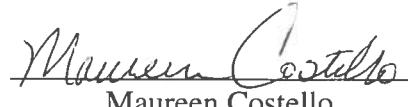
DECLARATION OF MAUREEN COSTELLO

I, Maureen Costello, hereby declare as follows:

1. I am a United States citizen and a resident of St. Louis, Missouri, residing at 3612 Arsenal St., St. Louis, MO 63116. I am an owner of MoKaBe's Coffeehouse.
2. On the evening of Monday, November 24, 2014 and the early morning of the following day, I kept Mokabe's open as a place of respite and safety for those engaged in protest activity following the announcement of the Grand Jury decision in the killing of Mike Brown.

3. At some point in the evening multiple lines of police in riot gear advanced on peaceful activists at the intersection of Arsenal and Grand, outside of MoKaBe's.
4. These lines eventually retreated and the demonstrators remained on the sidewalk.
5. During this time, I gave a friend a ride home.
6. When I returned, approximately 60 to 80 individuals in MoKaBe's had been hit with tear gas. Cannisters remained on my patio and gas lingered in the front and rear as well as inside.
7. Those hit directly included my children, friends, and employees. Many were still crying.
8. The gas remained in MoKaBe's and hurt my eyes and throat.
9. The armored vehicle from which gas was launched remained as well as lines of militarized police. They wore no visible identifying information. We were trapped.
10. At no point were any attempts made to clearly communicate the desires of the police. I was informed that my patio was not private property and anyone on the patio would be arrested.
11. This standoff lasted for more than three hours.

I declare under penalty of perjury under the laws of the United States of America that
the foregoing is true and correct. Executed on November 30, 2014.



Maureen Costello